

UNITED STATES BANKRUPTCY COURT

DISTRICT OF MINNESOTA

In Re:

Bky Case No. 15-30125

The Archdiocese of Saint Paul
And Minneapolis,

Debtor

**MEMORANDUM IN SUPPORT
OF OBJECTION TO SALE**

Friends of Cathedral Hill, a Minnesota non-profit corporation and prospective bidder for the Chancery property, by and through its undersigned counsel, Respectfully submits this memorandum in support of its objection to the sale as required by Local Rule 9013-2(b).

Movant is well-financed and is desirous of participating in the auction for the purchase of the property. Movant was unable to complete arrangements to timely submit its bid and therefore participate in the auction sale. Inclusion of Movant as an additional bidder at the sale will likely increase the amount to be received upon sale of the subject property which will benefit all of the creditors of the estate. As the time for bid submission has elapsed and the impending auction sale requires that a qualified bid be first received before participation in the auction sale, Movant is compelled to object to the approval of the auction sale.

WHEREFORE, Movant respectfully objects to the approval of the auction sale.

Respectfully submitted,

/e/ Andrew T. Brever

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